

that would essentially eliminate any downward trend in forage conditions while providing for more wilderness protection. Alternative C would allow a downward trend of 4%, which cannot be justified considering the relatively small number of AUM's (approximately 80,000) that would be gained over the level in Alternative D.

The use of ORV's, unlike livestock grazing, is not a useful and productive utilization of the public lands. The only benefits accrue to the persons engaging in ORV use (a very small percentage of the total long-term visitor use days, even in Alternative C). On the other hand, ORV use conflicts with virtually all other uses of the lands, and inflicts significant damage on the quality of the resource. ORV's should be restricted to only a very small proportion of the resource area--10 to 25% of the area would be a very generous proportion to keep open. With the overwhelming evidence regarding the aesthetic and environmental damage caused by ORV's and the lack of any equally compelling reason to ignore this evidence, it is well past time for the use of ORV's on the public lands to be severely curtailed. In this area, even Alternative D is severely lacking in controls. It should be amended to limit ORV use to no more than 25% of the resource area.

Alternative D, with the exception of the issue of ORV's, offers the best balance of multiple uses for the resource area. I strongly urge you to make this alternative, with alteration in the ORV use restrictions as noted above, the preferred alternative in the final RMP/EIS rather than Alternative C. The losses of wilderness resources and values alone that would accompany implementation of Alternatives A, B and C would be unjustified, unacceptable and indefensible. Adoption of the amended Alternative D would, as stated on page 2-43 of the draft RMP, favor "protection of fragile resources and wildlife habitat, preservation of natural systems and cultural values, and nonconsumptive resource uses". These are entirely appropriate and reasonable goals for future management of the Monument and Bennett Hills resource areas.

Thank you for the opportunity for comment.

Sincerely,

*Michael G. Kellett*  
Michael G. Kellett

LAKE CHANNEL CATTLEMEN'S ASSOCIATION, INC.  
P. O. Box 187  
American Falls, Idaho 83211

August 6, 1984

Ervin Cowley, Project Manager  
Bureau of Land Management  
P.O. Box 2 B  
Shoshone, Idaho 83352

Dear Mr. Cowley:

In studying the Monument Resource Management Plan, the consensus of the membership of the Lake Channel Cattlemen's Association is to favor alternative plan C.

For many years, our association has worked cooperatively with the Bureau of Land Management to complete a considerable number of worthwhile range improvements. These have included the drilling of wells for stock water development, cross-fencing the range unit to facilitate the rest rotation grazing system, sagebrush and weed control, re-seeding to adapted grasses, the providing for the services of a range rider annually, and the strict observance of all range management practices advocated by the Bureau of Land Management.

These practices have been followed over a period of many years to protect the soils of the range unit which, you will recall, are highly erosive. We feel the protection of native and adapted vegetative species is essential to the protection of the land itself.

With our present ability to produce crops in great abundance, we feel strongly that our grazing lands should continue to be protected by good and conservative range management. Then if the time ever comes when our country desperately needs them for more intensive food production, they will still be available and in top condition to do the job.

Sincerely,

*May Hunt*  
May Hunt  
President

Letter Number 28

## Jerome County Historical Society

Route 4, Box 4542

August 4, 1984

Jerome, Idaho 83338

Ervin Cowley, Project Manager  
Bureau of Land Management  
P.O. Box 2 B  
Shoshone, Idaho 83352

Re: Monument Resource Management Plan EIS draft

Dear Mr. Cowley:

Thank you for the opportunity to review the draft of the Monument Resource Management Plan Environmental Impact Statement. The Jerome County Historical Society's comments are addressed to the cultural resources section of all the alternatives included in the draft; and also Map #8, "Cultural Resources, Areas of Geologic Interest and Isolated Tracts."

Although there were a number of concerns voiced by members of the Jerome County Historical Society when they considered this draft they felt the following to be most important:

- 28-1 1. That the plan in its final form include the National Historic Trails Act as one of the federal laws to be complied with.
- 28-2 2. That the Jerome County Comprehensive Plan, especially the sections relating to cultural resources be recognized and considered whenever management practices are being formulated for federal land in Jerome County. Enclosed you will find an up-dating amendment that has been approved by the Jerome County Commissioners and incorporated into the comprehensive plan for the county.
- 28-3 3. That the Cultural Resources Map (#8) be corrected to show the Shoshone-Shoshone Falls (Walgamott-Sullaway) Road and Shoshone Falls Boulevard, a route with special significance historically to the development of this valley. The society also requests the route of Blue Lakes Boulevard be corrected to show its true northern terminus and those portions of the boulevard still in existence on the south end of the road be added to the map.

- 28-4 4. That the designation of "Bubbs Road" be re-evaluated for its inclusion on Map 8 since such designation is not shown on the first cadastral survey made of that township and range in 1893. The society requests that the designation "Boise-Kelton Road" which appears on the 1893 survey be placed on the map instead of the current designation of "Bubbs Road."

Once again, the historical society appreciates the opportunity to comment on this draft and offers its assistance with any questions you may have regarding our suggestions or related questions.

Sincerely,

*Virginia Ricketts*  
Virginia Ricketts  
President  
Jerome County Historical Society

Enc:

August 6, 1984

Response to Letter Number 28

- 28-1 The primary route of the Oregon Trail as designated by the National Park Service pursuant to requirements in the National Trails System Act (P.L. 90-543) does not cross the area included in this RMP. There are several alternate routes through this area which are managed cultural resources, but may not be managed as the Oregon National Historic Trail. We have recognized these as locally or regionally significant resources.
- 28-2 We have reviewed the Jerome County Comprehensive Plan and believe that management of cultural resources under our standard operating procedures described in Appendix H conforms with its requirements.
- 28-3 The Shoshone to Shoshone Falls Road (Walgamott-Sullaway) does not appear on the original survey dated 1895 of T. 9 S., R. 18 E., S.M., or on the original plot of T. 9 S., R. 17 E., S.M. dated 1884, both near Shoshone Falls. The road does appear on the 1895 survey of T. 8 S., R. 17 E., T. 7 S., R. 17 E., and T. 6 S., R. 17 E. Additional research will be required to determine the exact location of the Walgamott-Sullaway Road and the northern terminus of the Blue Lakes Boulevard. When established, protective measures will be implemented as appropriate.
- 28-4 Map 8 has been changed in the final EIS and now shows "Boise to Kelton" instead of "Bubb's Road."

Chuck Hauser  
District Manager  
Bureau of Land Management  
Shoshone Idaho

Dear Sir,

I would like to comment on the Resource Management Plan for the Monument Planning District. First of all I would like to compliment the staff on the work they put into preparing the draft environmental plan.

As a representative of the Hidden Hill Water Co., I am quite satisfied with Alternative 1. While not all the lands our group have filed on are included with this plan, the best of it is. I therefore urge you to use Alternative 1, as the new Resource Management Plan.

Sincerely

Ralph Ingram  
Ralph Ingram

Letter Number 30

Letter Number 31

TO: Erwin Cowley, Project Manager  
Monument Resource Management Plan  
Shoshone District BLM

Aug. 7, 1984

FROM: Janet Ocorowley  
POB 664  
Pocatello, ID 83348

RE: Monument RMP and EIS  
For the Hearing Record

Speaking for myself only, but with the perspective of a chapter Representative of Committee for Idaho's High Desert, and one who has a close interest in the fate of public lands so near to my home, may I respectfully offer the following comments:

I feel that Alternative D comes the closest to fulfilling BLM's mandate to conserve and improve the public land under its care, however there appear to be serious shortcomings in the approach used here.

Specifically, a callous regard for numbers of antelope, deer, and game birds is indicated in proposing such large loss levels to be sustained before protection swings into action.

Specifically, when livestock grazing has brought the general range condition down and continues down in 75% of the acreage, I cannot countenance increasing grazing numbers nor spending more public funds to build pipelines into an already marginal grazing area, especially when those animals pay only \$1.37 per month back into public coffers.

Specifically, I should like to see more attention directed toward satisfying the needs for public campsites, and associated kinds of recreation space. Due allowance for motor vehicle access must be given, but all motor vehicles are destructive of land surface and its cover. More people will be walking and camping - and we all need, require, the opportunity for undisturbed solitary recreation.

Finally, I make a plea for the land itself, quite apart from any resource value; just the land, to have the right to continue the way it has for untold ages, where management is only a helping hand, not a distortion of nor irreparable change from the land's own destiny. A erica is not just people, it is mountains, skies, and waters, as well as waving fields of grain. My patriotism is due first of all to the land of my birth, and not in second place to shortsighted exploitative use by one or two generations who happen to live here just now.

Please see to it that Wilderness or other type protection such as ACEC is given to Raven's Eye, Sand Butte, Shale Butte, Cedar Fields, Vineyard Lake, and the Blue Heart/Box Springs area, all that is in your power to protect. These places will never again be what nature made them if Americans are allowed to use them carelessly.

Thank you

Janet Ocorowley

August 6, 1984

Erwin Cowley, Project Manager  
Bureau of Land Management  
P.O. Box 2 B  
Shoshone, Idaho 83352

Dear Mr. Cowley,

As a large user of the monument area, I would like to give my full support to the alternative plan C. It meets the need of the public and for a time to come.

Sincerely, David Bethke

David Bethke  
Route 1, Box 59  
American Falls, Idaho 83211

1525 Malad  
Boise, ID 83705  
August 6, 1984

Mr. Ervin Cowley, Project Manager  
Monument Resource Management Plan  
Shoshone District BLM  
PO Box 28  
Shoshone, ID 83352

Dear Mr. Cowley:

I do not feel that any of the alternatives offered in the Monument Resource Management Plan adequately manage the resources. I will, therefore support Alternative D. I have the following comments concerning the plan:

- o I feel the monitoring trigger levels on deer and antelope are too high. I think the BLM should use range improvement funds to create and replace the range and I oppose selling any of the winter range.
- o Because wildlife and natural values outweigh the economic benefits of any land sales, I oppose all land sales.
- o I support wilderness for Shale Butte, Sand Butte, Raven's Eye, Little Deer, and Bear Den Butte USAs. These areas offer unique wilderness opportunities and deserve protection.
- o According to the plan, heavy soil erosion is acceptable. I feel this is one resource that requires far more study.
- o I believe the SCORP (1983) recommendations should be followed and I support frequent maintenance on the Sand Butte, Bear Trap-Crystal, and Minidoka-Arco roads.
- o I oppose any pipelines or range improvements in Laidlaw Park. Also, any good condition rangeland should be left ungrazed.

I wholeheartedly support your recommendations for Box Canyon and Blue Heart Springs as Areas of Critical Environmental Concern. I feel this is a wise and pertinent area to protect.

Thank you for this opportunity to comment.

Sincerely,

*Dorian Duffin*  
Dorian Duffin

6 August 1984

Mr. Ervin Cowley  
Monument Resource Management Plan  
Shoshone District BLM  
PO Box 28  
Shoshone, ID 83352

RE: Monument Resource Management Plan/Draft EIS

Dear Mr. Cowley:

I find it incredible that the preferred alternative calls for an increase in grazing for an area with 98% of the vegetation in poor or fair condition. Surprise aside, I endorse Alternative 4. I also commend the Area of Critical Environmental Concern recommendations for Blue Heart (or Big Heart) Springs, Box Canyon, Silver Sage Playa, Virgand Creek, and Substation Tract.

I have the following comments regarding the plan:

- Recreation is ignored. I feel the plan should at the minimum comply with the State Comprehensive Outdoor Recreation Plan. I would like to see good road access to the wilderness trails so that the public can enjoy these areas. In particular, Arco-Minidoka, Sand Butte, Bear Trap-Crystal roads should be maintained.
- The monitor trigger levels for mile deer and antelope should be lowered to 15% declines in summer or winter range count. We should concentrate on refurbishing the range and should absolutely prohibit any land sales. ALL pipelines should be prohibited; they only represent yet another form of cattle welfare.
- I feel that economics and soil conservation should be studied in far greater depth. These two items, if adequately studied, would change the preferred recommendation (in my opinion).
- I support wilderness for Shale Butte, Sand Butte, Raven's Eye, Little Deer, and Bear Den Butte.

I do not feel that this plan provides for the wants and needs of Idahoans. We would like to see a plan that balances uses of grazing with multiple use needs of recreation, wildlife management, and economics. I feel this area, the heart of southern Idaho, needs to be managed for the future of wildlife and people.

Thank you for allowing this opportunity to comment.

Very sincerely,

*Stacie Vader*  
Stacie Vader  
1525 Malad  
Boise, ID 83705

Response to Letter Number 33

33-1 These sections have been expanded in the final EIS.

August 9, 1984

Bureau of Land Management  
Shoshone District  
P.O. Box 28  
Shoshone, ID 83352

Dear Mr. Cowley:

In regards to our discussion concerning our management plan for the BLM ground in the Norland area, we would like to submit this letter.

After many years of observation, we would like you to consider the possible use of Range 24E, Township 6S., Section 29E, M., for agricultural use. The rock is a concern, but we feel it would be economically feasible for agricultural use. This ground adjoins our farm, therefore, we would be very interested in purchasing it.

Range 24E., Township 6S., Section 28S, ~~NE 1/4 SW 1/4~~ <sup>NE 1/4 SW 1/4</sup>, adjoins our farm on two sides. We feel that this piece of ground could also be used for agricultural purposes and would be very interested in purchasing it. There are several reasons we are especially interested in this 40. We would like to mention one or two. We are in the process of converting our farms to center pivots. With the acquisition of this 40, it will be economically feasible to do this.

Another matter of concern we have is the ground in this 40 acres is not on the side of the butte. Therefore, it would not be classified as a high erosion area. Just east of this however, the butte does start and there would be a matter of concern because of the slope. Another reason is the sheep men, in grazing this 40, have been as much a nuisance to us as we have been to them, for we border this piece on two sides, and trespassing onto our property has been a problem.

We would like to request an onsite visit with anyone concerned, to further state our case.

Sincerely,

*Steven D. Young*  
Steven D. Young  
Desert View Farms, Inc.



August 1, 1984

Mr. Ervin Cowley  
Project Manager  
Bureau of Land Management  
P.O. Box 28  
Shoshone, ID 83352

Re: Monument Resource Management Plan and  
Environmental Impact Statement

Dear Mr. Cowley:

Atlantic Richfield Company appreciates the  
opportunity to comment on the Monument Resource  
Management Plan and Environmental Impact Statement.

Atlantic Richfield, primarily an oil and gas company,  
is active in mineral exploration and development  
through one of its divisions, Anaconda Minerals  
Company. Although you acknowledge the mineral  
potential along the Snake River, you do not  
acknowledge the potential along the northern boundary  
of the Resource Area. Running northeast from the  
Blaine/Lincoln county line to the northern most point  
of the Resource Area is an area of potential gold  
associated with paleo hot springs.

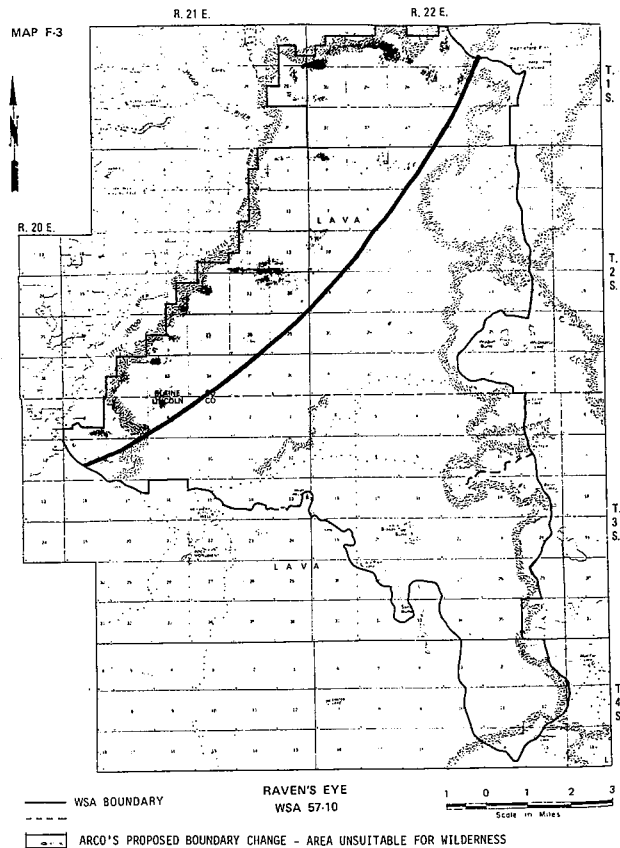
Although it may be too late to eliminate this area  
from the Great Rift WSA that has been recommended as  
suitable for wilderness in a previous study, we hope  
you will consider changing your recommendation for  
the Raven's Eye WSA to unsuitable for wilderness or  
at least modifying your boundary as shown on the  
attached map.

If you have any questions regarding this  
recommendation, please contact me at the above  
address or phone number.

Sincerely,

*Peter B. Briggs*  
Peter B. Briggs

PBB:LJW:drm  
Attachment



Response to Letter Number 35

35-1 The area mentioned in your letter of August 1, 1984, was investigated  
during the Geology, Energy, and Mineral (GEM) Resource Evaluation of  
July 1983. This evaluation, performed by WGM, Inc., found no indica-  
tions of metallic minerals based on the unfavorable geologic setting,  
the lack of mineral occurrences, and the tectonic setting and geologic  
processes active in the area compared with those of similar areas which  
are mineralized.

Evidence of mineralization or geologic structures favorable to  
mineralization which you may present will be considered in the final  
EIS for the applicable WSA(s).

IDAHO DEPARTMENT OF FISH AND GAME  
REGION 4  
868 East Main • Box 428  
Jerome • Idaho • 83338  
August 8, 1984

Letter Number 36

Charles Haszler  
District Manager  
Shoshone District  
Bureau of Land Management  
Box 28  
Shoshone, ID 83352

Re: Draft Monument Resource Management Plan (RMP)  
Environmental Impact Statement

Dear Chuck:

The Department of Fish and Game has reviewed the Monument RMP and offers the  
following comments and recommendations:

We disagree with the selection of Alternative C as the preferred alternative.  
Alternative C provides for increased livestock stocking rates, more brush  
treatments, and accelerated land disposal at the expense of wildlife.  
Benefits to wildlife are rarely by design in this alternative, but rather  
appear to be products of livestock management.

We have the following specific concerns regarding the preferred alternative:

- p. 1-14 "The Preferred Alternative would recognize the expressed need to  
make land with potential for agriculture available for future  
development." On a large scale, the "expressed need" is questionable  
when federal programs such as PIK are utilized to keep existing  
agricultural land out of production. Much of the BLM land with  
agricultural potential would also be suitable for inclusion in  
the isolated tracts program, or for retention and development of  
big game winter range.
- p. 1-16 "...the Preferred Alternative would provide for multiple use while  
allowing livestock grazing." The opposite appears to be emphasized  
under Alternative C; multiple use is secondary to livestock  
grazing.
- p. 1-17 "the Preferred Alternative...provides for improvement of critical  
winter pronghorn habitat." Although portions of the habitat may  
be improved, the net result of the alternative is the loss of  
historic winter range and a 3% decline in antelope populations  
(p. 2-67).

- p. 2-11 The maximum grazing alternative (B) was not considered in this plan because "given the amount of nonuse by grazing permittees, the demand for this large amount of forage probably doesn't exist at this time." The same argument applies to Alternative C and yet it was considered and chosen as the preferred alternative. The forage base and resulting stocking levels proposed under Alternative C can not be justified by the existing permittee demand. Future grazing demand is very speculative.
- 36-1 p. 2-19 Here and throughout the entire report Vineyard Creek is misspelled as Vineyard Creek.
- Vineyard Creek provides the main known spawning habitat for a unique strain of fall spawning hybrid rainbow cutthroat trout.
- 36-2 p. 2-20 Herein and throughout the report the Shoshone sculpin should be listed as a species of special concern rather than a sensitive species. It is also a candidate for endangered species status.
- p. 2-34 "Potential high value Isolated Tracts with agricultural entry applications filed on the tract would be placed in T2 category." These tracts also have the highest potential for production of upland game habitat through cooperative agreements and at least a fair portion of these should be managed as L11 areas.
- 36-3 p. 2-41 At the Preferred Alternative, proposed stocking level of 144,776 AUM's (48% higher than the current five year average actual use) "no significant conflicts with other resources were identified..." We contend that the proposed brush controls and seedings required to achieve these stocking rates will produce "significant" conflicts with wildlife, particularly on sage grouse and big game ranges.
- p. 3-3 We agree wildfires and agricultural development are two major influences on wildlife in the resource area. However, they should not be considered as "largely beyond management control." This problem of cheatgrass invasion is severe, but land managers and wildlife managers must continually develop and test potential solutions. Grass and forb species, especially new varieties which show potential to compete with cheatgrass, should be seeded.
- 36-4 The rehabilitation of big game winter ranges destroyed by wildfires near Kimama should receive high priority. During the 1983-84 winter, approximately 2-3,000 deer migrated from the Picabo Hills and northern desert ranges, through the Kimama area, to agricultural land near Eden. Depredations were severe and winter losses were substantial. Seeding of sagebrush and bitterbrush to provide forage for these animals, should be an ongoing effort on the Kimama range.

Charles Haszler  
August 8, 1984  
page 4

- 36-8 Visitor use days for sage grouse, varmint and predator hunting and trapping would be valuable additions to the plan.
- The Department supports Alternative D. Adoption of this alternative would address most of the concerns we expressed for Alternative C. Alternative D would provide for substantial increases in all big game, upland bird and nongame bird populations. It would expand the isolated tracts program to 126 tracts and increase the wilderness acreage.
- Livestock grazing, land disposals, acreages and brush control acreages would be decreased. Livestock levels under Alternative D are based on the 1977 drought year which should prove to be a reliable standard. We regard the actions under Alternative D as positive for the wildlife resource and the multiple use concept.

We appreciate the opportunity to comment on this document.

Sincerely,

*William E. Webb*  
William E. Webb  
Supervisor, Region 4

cc: Bureau of Wildlife  
Bureau of Program Coordination - R484-020

Charles Haszler  
August 8, 1984  
page 3

- The disposal of lands for agricultural purposes should not always be the prime consideration when these areas also provide big game winter range or upland game habitat.
- p. 3-4 "Range improvements...are in many cases, beneficial to wildlife." We agree in some cases brush removal can enhance brood rearing habitat or big game summer range. Replacement of cheatgrass by seedings is often desirable. However, after implementation of the proposed "beneficial" range improvements, mule deer and antelope populations are still expected to decline by 2 and 3 percent respectively (p. 2-67).
- p. 3-7 & map 7 The mule deer and antelope winter ranges outlined in Map 7 should include the range utilized during a severe winter such as 1983-1984. The "typical" winter range was of little value to these animals last year. The most critical deer winter range is the area used during the most severe winter. The identification of this area and maintenance or improvement of the habitat is paramount.
- 36-5 p. 3-8 Under Hybrid CT-RB Trout now reads "Vineyard Creek is the only known spawning habitat for a unique hybrid trout." This should be corrected to read "Vineyard Creek provides the main known spawning habitat for a unique strain of fall spawning hybrid rainbow cutthroat trout."
- 36-6 p. 4-28 The proposed transfer of five of the 87 Isolated Tracts from Federal ownership to agricultural use is unacceptable. The isolated tracts program should be expanded, not reduced. Most of the parcels available are highly valuable for upland game, nongame, and access. Tracts should not be eliminated because they are inaccessible. Existing or potential habitat should be the prime consideration.
- p. 4-29, 30 Under the Preferred Alternative, a net population gain of only 1% for sage grouse and population declines in mule deer and antelope are predicted. Livestock stocking rates will increase 48% over current use for this alternative. The large discrepancy between wildlife and livestock use is not justified.
- p. 4-31 An estimated 21,910 sheep AUM's would be converted to cattle AUM's under Alternative C. The conversion would probably result in greater impacts to wildlife, particularly on unfenced riparian areas and bitterbrush stands which receive late summer or fall livestock use.
- 36-7 p. 4-38 Long-term increases in mule deer hunting activity (visitor use days) are projected to be nearly 300% above current use levels. This heavy demand will be confronted by declining mule deer populations under the preferred alternative.

Response to Letter Number 36

- 36-1 The official spelling according to the U.S. Board of Geographic Names is "Vineyard Creek." This is the spelling we have used in the RMP. (Note: The RMP maps indicate the spelling "Vineyard Creek." This is simply a cartographic error.)
- 36-2 The Shoshone sculpin is referenced as a candidate endangered species in the final EIS.
- 36-3 The proposed brush removal and seedings are very limited, as evident on Map 16. Prescribed burns in sage grouse habitat will have positive effects. The understory of forbs will be released for grouse broods, and the potential for a major conflagration will be reduced.
- Seedings will only be carried out where the understory consists mainly of cheatgrass. A mixture of perennial grasses and forbs would be superior to cheatgrass for nearly all wildlife species.
- Big game ranges are only slightly affected in proposed treatments. Seeding of crested wheat in the Wendell-Canyon area may have a short-term impact on wintering antelope. However, in the long term, the reduction in wildfire will allow more brush to recover for longer periods and should benefit wintering big game. Again, wildfire is the biggest problem, not land treatments.
- 36-4 This comment reflects some misinterpretation of our meaning. The writeup at the beginning of the Wildlife section in Chapter 3 has been modified for clarification. The two factors "largely beyond management control" are frequent wildfires and subsequent domination of the habitat by cheatgrass. We do consider these factors "largely beyond management control" as indicated on page 3-3 in the final EIS. We agree that we should try new solutions to these problems and we intend to do so as they become available. However, at this time, there are no new solutions that look promising enough to include in the RMP.
- In the past, agricultural development on winter range has had an important influence on populations of big game and sage grouse. While we have no control over this past development, we do have some control over future development of public lands for agriculture.
- 36-5 The draft RMP/EIS was prepared during the winter of 1983-1984. At that time, no data on big game distribution was available. Our recognition of the problem is evident on page 3-7 of the draft, and this will be the highest priority for big game habitat improvements. Our intention



**SIERRA CLUB**  
**MIDDLE SNAKE GROUP**  
 Box 552 Boise, Idaho 83701

is to handle the critical winter range management problem through habitat management plans as discussed on page 4-30 of the draft. The pronghorn winter range RMP area is shown on Map 15. Areas south of this RMP area are predominantly private farmlands over which BLM has no control. Thus, identification of these areas as critical winter habitat would not increase our management options.

36-6 This change has been made in the final EIS on page 3-8.

36-7 Unfenced riparian areas are currently very limited in number. We don't see any significant damage potential here. Existing plays are heavily used by sheep now. Most of these have no potential for riparian habitat.

Bitterbrush stands may suffer heavier livestock use, as suggested. On a case-by-case basis, we will analyze where important bitterbrush remains that might be affected by conversion from sheep to cattle. Then we will examine management options for protecting that bitterbrush. The re-establishment rate of sagebrush is a much more serious problem for big game than is the condition of bitterbrush.

36-8 Presentation of visitor use data for sage grouse, varmint, and predator hunting and trapping was considered, but not included in the EIS. The management actions proposed in the alternatives would have negligible impact on these recreation activities. Varmint and predator populations would not be greatly affected. Sage grouse populations would vary among alternatives with Alternative B projecting a 10 percent increase and Sub-Alternative D projecting a 20 percent decrease. However, sage grouse hunting visitor use days were not projected to vary among the alternatives. Sage grouse hunting use seems to be more related to highs and lows in the normal population cycle.

08 Aug 84

Ervin Cowley  
 Shoshone District BLM  
 Box 28  
 Shoshone, ID 83352

Subject: Comments on Draft Monument RMP

Dear Mr. Cowley:

The Bureau of Land Management is charged with the task of managing the public lands for multiple use. An RMP should provide for balanced multiple use. The preferred alternative of the Monument RMP does not meet this test.

The Monument Resource Area is not currently in sound condition. Much of the land shows the impact of overgrazing. None is in excellent condition, only 2% in good condition. A multiple use alternative would seek dramatic improvement in this unacceptable situation.

The preferred alternative increases erosion, transfers wildlife habitat to private hands and reduces the number of big game animals. We do not feel this is appropriate for a multiple use plan.

A multiple use plan would seek to improve the ecological condition of the seeded, poor or fair condition range that makes up 95% of the Resource Area. To do otherwise is to engage in consumptive use of what ought to be a renewable resource. Instead we find a proposal to mine much of the remaining grass through construction of a stock watering pipeline into the Laidlaw Butte area. We find this unacceptable.

A multiple use alternative would seek to reduce the amount of soil erosion and increase the quality of the area's watersheds and watercourses. Your preferred alternative increases erosion and reduces soil productivity. We find this unacceptable. We are disappointed to find no proposals to restrict cattle access to water sources and riparian zones.

By definition, wilderness represents a unique and irreplaceable resource. A multiple use alternative would recognize that the BLM wilderness inventory eliminated from the study process those lands not possessing outstanding wilderness characteristics (as well as some lands with those characteristics). A multiple use alternative would, therefore, recommend all six WSA's suitable for Wilderness designation. We

... To explore, enjoy and preserve the nation's forests, waters, wildlife, and wilderness...

Response to Letter Number 37

urge adoption of an alternative that recommends Shale Butte, Sand Butte, Raven's Eye, Little Deer, Bear Den Butte, and Shoshone WSA's suitable for Wilderness. We find the analysis and rational for the wilderness recommendations in the draft RMP to be superficial and inadequate for such an important decision.

We applaud your proposal to create ACEC's in Substation Tract, Vineyard Creek and Box Canyon/Blueheart Springs. We suggest that grassland in good condition has become so rare and so threatened in the Resource Area that such a grassland is an area of critical environmental concern wherever it is found. For this reason, we support the proposal to designate the Last Chance Kipuka an ACEC.

A multiple use plan would plan for and provide the resources to meet the increased demand for recreation. The Monument RA has ample opportunity and resources to provide for increased developed and undeveloped camping and hiking. Since even a reduced grazing alternative would still result in heavy stocking levels the RMP should provide for fencing to exclude cattle from camp sites, water sources and riparian zones.

A multiple use plan would recognize the impact of years of overgrazing on Idaho's wildlife population and propose measures to reverse this unacceptable trend. We are amazed to read that your proposed alternative actually provides for and accepts further reduction in big game population. We are appalled that your proposed alternative marks for sale areas now used as winter range. Specific plans should be made to meet the habitat and feeding needs for increased levels of both game and non game wildlife in the resource area.

In the range of alternatives found in the draft RMP only alternative "D" appears to meet BLM's mandate to manage the public lands for multiple use. We urge to adoption of alternative "D" in the final RMP.

Thank you for the opportunity to comment on this RMP.

*Charles C. Yoder*  
 Charles C. Yoder  
 Chair, Conservation Committee

37-1 The analysis and rationale for the wilderness suitability recommendations will be more detailed in the final Wilderness EIS for the Monument Planning Area.



# STATE OF IDAHO

## DEPARTMENT OF LANDS

STATEHOUSE, BOISE, IDAHO 83720  
STANLEY F. HAMILTON  
DIRECTOR

Letter Number 38

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August 8, 1984

Charles J. Hazier  
District Manager  
BLM, Shoshone District  
P.O. Box 2 B  
Shoshone, ID 83352

Re: 1601

Dear Mr. Hazier:

The Department of Lands has reviewed the Monument Resource Management Plan/Environmental Impact Statement. Our recommendations are as follows:

1. Land exchange to consolidate ownerships be placed as a high priority in the District's planning process.
2. Because of a significant amount of intermingled ownership, Idaho Department of Lands needs to be involved early with management decisions that directly involve state land.
3. Any changes in exchange-of-use need prior cooperative review by the State and BLM.
4. Since the endowment lands were given to the State for income purposes, any potential negative impact on revenues causes concern. Any limitation of access for oil and gas, or mineral development may reduce income to the public schools. Therefore, prior to any restrictions on access we request that land exchange be pursued to provide the State with other lands of equal potential.

Thanks for the opportunity to comment.

Sincerely yours,

*Donald E. Hobbs*  
DONALD E. HOBBS, Chief  
Bureau of Range Management

DEH:vp

EQUAL OPPORTUNITY EMPLOYER

Relia, ID.  
H.C. 60 Box 1420  
Aug. 8<sup>th</sup> 1984

*Decision of Town Management,  
Shoshone, Idaho.  
Ref: M. R. M. Plan.*

*Dear Sir: For your consideration I  
would request the transfer of public lands,  
isolated tracts G 12 T4S, R13E, Sec. 70 & NW 1/4*

*to private ownership:*

*1. Due to the fact that this tract is covered  
on an isolated tract (G 12) condition  
with no public access apparent.*

*2. Proper management to improve public access.*

*It has cattle, B. Grass huffer & several different  
cattle. C. Pine cattle. E. Wooded muskoxen cattle  
(P. & C. cattle, T. & C. cattle) in the area to be acquired  
by the State. It is a very nice area.*

*3. The fact that a large 1/4 section would be  
included - more aquatic habitat for ducks.  
Good fence line and vegetation habitat for  
beaver to use.*

*We feel that these lands in private ownership  
would be put to more beneficial use with  
less cost to the public in their deferred  
economic times. This location being isolated to  
good management & access. Sincerely yours, R. H. Dalton*

Letter Number 40

JOHN T. PEAVEY PRES.  
FLAT TOP SHEEP CO.

P.O. Box 88  
Cary, Idaho 83320

Home: 788-2850  
Meal Time: 788-2707

August 9, 1984

Mr. Ervin Cowley  
Project Manager  
BLM  
Shoshone, Idaho

Dear Ervin:

This letter contains my comments on the Monument Resource Management Plan Environmental Impact Statement Draft.

My major concern is the classification of most of the BLM lands within the Norland allotment for transfer from public ownership. I feel that this classification will not only place in jeopardy continued grazing in the Norland allotment, but also much of the cattle use which takes place in the Kimama, Poison Lake, and Muldoon units as well.

The Norland allotment is highly developed with crested wheat seedlings, cross fences, working corrals and dug lakes. It is an intensively managed and a highly productive allotment used as an early spring calving ground. As such it is the key to our cattle operation. Without it the BLM could easily lose another grazing operation placing even more of the Monument area into non-use.

The fact that the allotment is an early spring use area means that all winter there is available to wildlife, especially antelope, more winter feed in the form of standing, fully developed, crested wheat plants.

There is more unused feed than in the Kimama unit to the north and the intensively farmed areas to the south. Each winter, this ungrazed allotment serves as a safety valve for the migrating game herds.

The many range improvements in the allotment represent a substantial investment of private and BLM money. These investments were made after the lands were classified for retention in an earlier study.

I don't feel the criteria cited on pages 2-35 of the draft EIS fit the public lands in the Norland allotment for inclusion in the T-1 category. Clearly, the lands are inside a grazing allotment that is easily and intensively managed. They are already fenced and contain other valuable public investments.

For these reasons, I would appreciate your reconsideration of the classification of these lands in the Norland allotment from transfer back to retention.

Sincerely,  
*John Peavey*  
John Peavey  
President